

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO

SCANNED AT CCI and E-Mailed  
to USDC OHSD on 8/7,  
2023 by CPinner  
No. of Pgs. 3

William F Bradbury, Jr., et. al.

v.

Scott, et. al.

CASE No.: 2:23-cv-02355-SDM-EPD

MOTION FOR INJUNCTION AND  
RESTRAINING ORDERS pursuant to  
Fed Rules Civ Proc R 65

NOTICE: To adverse party for the Court to issue a preliminary injunction  
restraining defendants, enjoining defendants, pursuant to Fed Rules Civ Proc R 65, to  
expedite hearing for the reasons set forth herein and issue an order for the same.

Respectfully,



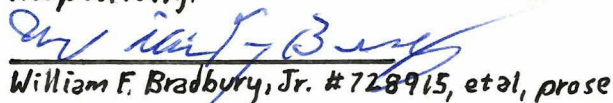
William F. Bradbury, Jr #728915, et. al., prose  
P.O. Box 5500  
Chillicothe, OH 45601

MEMORANDUM FOR ORDER

- (d) (1)(A) Incarcerated persons (IP) have purchased JPay tablets over past ten (10) years as previously authorized by defendants, which include additional millions of dollars of protected free speech (i.e. video games; videos; E-books; photos; music; religious books and audio files; etc.)
- (B) Preliminary Injunction restraining order to be ordered promptly for duration of case, to be converted to Permanent Injunction, ordering defendants to cease and desist the taking and collecting of JPay tablets, to order the defendants return to IPs all JPay tablets thus far taken, and to stop prohibiting IPs protected free speech.
- (C) Defendants are prohibiting IPs from protected free speech by ordering under threat, with no penological purpose, nor penological interest, removal of the same, a violation of U.S. Const., First Amend., and 18 USCS 1951 (b).
- (d) (2)(A) Persons bound: OHIO DEPARTMENT OF REHABILITATION AND CORRECTION (ODRC); JPay / Securus Technologies; Viapath; GTL; Touchpay Holdings, L.L.C. d/b/a GTL Corp. d/b/a Viapath Technologies; et al;
- (B) the parties' officers, agents, vendors, contractors, employees, and attorneys;
- (C) and other persons who are in active concert or participation with anyone described in Rule 65 (d)(2)(A) or (B)

And Plaintiff(s) move this Court for a hearing pursuant to Fed Rules Civ Proc R 65 (a)(2).

Respectfully,

  
William F. Bradbury, Jr. #728915, et al, prose

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Chillicothe, OH 45601

**CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2023, I mailed my Motion for Injunction and restraining order to the Clerk of Courts for filing. Upon the clerk's docketing of this pleading, notice of this filing will be sent through the Court's electronic filing system to all parties represented by attorneys who are registered users of the Court's electronic filing system as provided for in Fed. Rules Civ Proc R 5(b)(2)(E).



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